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Australian Energy Market Operator Ltd ABN 94 072 010 327

To ensure these changes can be delivered for the 2024 RC Cycle, and prevent the need to defer elements of the 2024 timetable, the relevant amending rules should be gazetted with commencement dates before the end of 2023. AEMO will also require approval from the Economic Regulation Authority for the expenditure required to implement the changes and is currently preparing to make a submission by March 2024.

AEMO has reviewed the proposed drafting, focusing on the rules that it considers can be implemented in 2024, and has identified many areas that require further clarification or amendment to address gaps and



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	<p>AEMO after CRC has been assigned. AEMO requests that clarification is provided in the rules on how it is to determine that a Candidate is committed, and if this is intended to be published with the RLM data prior to the CRC window closing.</p>
<p>Determination of Forced Outage Rates for Facilities at different points in their lifecycle</p>	<ul style="list-style-type: none"> • Certain Facilities are excluded under the revised Forced Outage Rate criteria in clause 4.11.1A. This includes Non-Scheduled Facilities (NSF) with only Electric Storage Resource (ESR) and Facilities that have been in Commercial Operation for less than 36 months. • AEMO requests clarification on whether the RLM is only intended to consider Forced Outage Rates, and how AEMO should consider Facilities that have not been in Commercial Operation for 36 months.
<p>Non-Candidate Facilities does not include all other facilities</p>	<ul style="list-style-type: none"> • In accordance with AEMO’s understanding, the Non-Candidate fleet should include all non-RLM facilities in the set. However, the new rules in Step B.3 outlining the Non-Candidate fleet parameters exclude any “proposed” (non-RLM) Facilities or any NSF with an ESR in the first 5 years of commercial operation. • AEMO queries whether the Non-Candidate fleet should be amended to include all non-RLM facilities/components that have CRC in this capacity year.

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	<ul style="list-style-type: none"> Given the above, AEMO queries whether it is possible to use 4 peaks and therefore proposes that n-3 is used instead of n-1.
Daily IRCR	<ul style="list-style-type: none"> Under amendments to clauses 4.28.6 to 4.28.7A, AEMO must calculate the Peak and Flexible IRCR (including the indicative IRCR and each of the weekly settlements) daily. A key learning from the WEM Reform program is that the generation of large amounts of data require additional design considerations and incurs maintenance costs. The monthly IRCR calculation currently generates approximately 48 million records per year. Calculating daily IRCR using the new methodology would see this increase to around 3.5 billion records per year. The volume of data generated and stored in the WEM has significantly increased following the implementation of the new market. AEMO questions whether there is ongoing benefit to implementing daily IRCR, given the low churn rate in the market and the likely increased implementation costs resulting from the increase in data volume.
<i>CRC Process Changes – Appendix 9</i>	
Independent expert reports	<ul style="list-style-type: none"> New Part A – A1(b) requires the Market Participant’s CRC application to include all required supporting information and to have been deemed by AEMO to be complete. The way this interacts with the new provisions around IFC and independent expert reports should be re-examined. Applications may not be complete until AEMO has assessed the IFC (CRC window close + 10 Business Days) and the Market Participant has provided any additional required information (another 10 Business Days). This could be as late as 22 July. AEMO requests guidance on when the application should be deemed complete, and when AEMO can commence the Relevant Level calculations, considering the current CRC assessment period of 35 Business Days.